



February 22, 2019

The Honorable Mark Gordon
Governor of Wyoming
Idelman Mansion
2323 Carey Avenue
Cheyenne, WY 82002-0010

Re: Time-Sensitive Request for Action to Defer the Sale of 31 Oil and Gas Parcels located in Wyoming's Most Important Greater Sage-grouse Core Habitat

Dear Governor Gordon:

We are writing with a sense of great urgency to request that you intervene immediately and urge the BLM to refrain from selling at its upcoming February and March oil and gas lease sales thirty-one (31) parcels near South Pass that contain the most robust populations of Greater sage-grouse on the planet. The area encompassed by the parcels is so rich in wildlife resources it is commonly referred to as the "golden triangle." Please see the attached description and maps supplied by Tom Christiansen, WGFD (Ret.) sage-grouse coordinator for the State of Wyoming.

These thirty-one parcels (identified below) represent a tiny fraction of the total number of parcels being offered by BLM at the February and March lease sales (568 parcels containing 768,942 acres at the February sale and 140 parcels containing 148,909 acres at the March sale) yet contain the most important greater sage-grouse habitat in the State.

The BLM's online auction for the special February lease sale begins next Monday, February 25th and runs to March 1st. According to the BLM's Notice of Competitive Oil and Gas Lease Sale, the parcels in question are scheduled to be auctioned on March 1st, the last day of this five-day sale, so there is still time to intervene. We are hopeful that if you ask the BLM to defer these parcels, it will do so. The BLM has emphasized repeatedly in various policy documents that states enjoy significant authority over wildlife, and has, to our knowledge, granted every request for deferral submitted by the WGFD since at least 2017.

Specifically, we request that you ask BLM to defer the following parcels from the February and March lease sales: WY-184Q-FEB19-535-540 and 542-545 (February sale) and WY-191Q-110-130 (March sale).

Knowing that the Wyoming Sage Grouse Executive Order would apply to any potential development on these parcels, you may question why we feel compelled to send this extraordinary request for help. It is because this area harbors the largest and most significant population of birds in the state, and we fear that any development in this area, even though subject to the conservation measures contained in the SGEO, could potentially impact the

viability and robustness of these thriving populations. Given the tremendous importance of this population to the overall effort to conserve greater sage-grouse, there simply is no room for error.

Wyoming has been a forceful and determined leader in the west-wide effort to conserve the greater sage-grouse, and we have every reason to believe that our role as a leader in this effort will continue under your administration. Taking this action will once again demonstrate that Wyoming has found that balance between energy development and protection of our state's bountiful natural resources.

In addition, we understand that you have ordered a review and evaluation of the State's sage-grouse executive order. Deferring leasing in the highest grouse density areas in Wyoming would preserve decision space and allow for meaningful discussions about land management allocation for high-density grouse areas such as those at issue here.

We are sorry for not bringing this matter to your attention earlier, but the environmental assessment (EA) prepared by the BLM for the special February 2019 lease sale did not disclose this particular information, and we just discovered the details yesterday afternoon.

We sincerely appreciate your prompt attention to this matter and, once again, respectfully urge you to take immediate action to secure deferral of the above-listed sage-grouse parcels from the BLM's February and March oil and gas lease sales.

We are available anytime, including this weekend, to answer any questions or provide additional information.

Sincerely,



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cc: Dr. Pat Arp
Chief of Staff for Governor Gordon

Brian Nesvik, Director
Wyoming Game and Fish Department

Mary Jo Rugwell
WY BLM State Director

Enclosure